



July 3, 2019

Via Electronic Filing

Hon. Douglas E. Arpert, USMJ
United States District Court - Trenton
Clarkson S. Fisher Fed. Bldg.
402 East State Street
Trenton, NJ 08608

**Re: Haley Schuler v. Monmouth Vocational School District
3:19-cv-00025-BRM-DEA**

Dear Your Honor:

As Your Honor is aware, I represent the Plaintiff in the above-captioned matter. Though counsel's brief was due on June 10, 2019, per the Court's briefing schedule, I do not object to counsel's request for an extension. I respectfully wish to make two corrections based on what counsel has represented in his letter. First, counsel and I only discussed an extension of July 1, 2019. (See Annex "A."). Second, counsel incorrectly states that it was the "fault of Plaintiff" that he did not see the electronic filing. The filing generates an automatic notice, which lists the email addresses of the parties to whom it is sent. (See Annex "B."). There was no fault on the part of Plaintiff, as counsel received notice when the brief was filed.

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Montgomery Law, LLC
Lawyers You Love

Please do not hesitate to be in touch should You Honor have any further questions.

Respectfully submitted,


Bradley R. Flynn, Esq.
For Montgomery Law

Cc: Mr. Michael Pattanite, Esq.

Encl.

7/3/19, 8:14 AM
Annex "A."



Bradley Flynn <bradley@ed-law.com>

Schuler

2 messages

Michael Pattanite <mpattanite@lenoxlaw.com>
To: Bradley Flynn <bradley@ed-law.com>

Wed, Jun 26, 2019 at 3:28 PM

Brad

I just saw the opposition to Schuler, I did not receive the electronic filing notification for some reason. Do you consent to me filing a reply brief by July 1, 2019?

Please let me know so I can write to the Court.

Thanks!

Mike

Michael A. Pattanite, Jr., Esquire
Partner



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Bradley Flynn <bradley@ed-law.com>
To: Michael Pattanite <mpattanite@lenoxlaw.com>

Thu, Jun 27, 2019 at 7:57 AM

Hey, Mike:

Sorry you didn't see the notice. I checked, and it generated on my end. Nonetheless, I am fine with you sending a letter to request the extension. The only thing I ask is that we exclude exhibits/references to exhibits in the reply, per the rules. Otherwise, I am on board with your request.

Also, we should set up a time for a quick call on this matter to discuss resolution. I should have some time next week, before the holiday.

Best,
Bradley

Sent from my iPhone

On Jun 26, 2019, at 3:28 PM, Michael Pattanite <mpattanite@lenoxlaw.com> wrote:

Brad

I just saw the opposition to Schuler, I did not receive the electronic filing notification for some reason. Do you consent to me filing a reply brief by July 1, 2019?

Please let me know so I can write to the Court.

Thanks!

Annex "B."



Bradley Flynn <bradley@ed-law.com>

Activity in Case 3:19-cv-00025-BRM-DEA SCHULER v. MONMOUTH COUNTY VOCATIONAL SCHOOL Brief in Opposition to Motion

1 message

njdefiling@njd.uscourts.gov <jnedefiling@njd.uscourts.gov>
To: njdefiling@njd.uscourts.gov

Mon, Jun 3, 2019 at 7:56 PM

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.

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U.S. District Court

District of New Jersey [LIVE]

Notice of Electronic Filing

The following transaction was entered by MONTGOMERY, JOSEPH on 6/3/2019 at 7:56 PM EDT and filed on 6/3/2019

Case Name: SCHULER v. MONMOUTH COUNTY VOCATIONAL SCHOOL
Case Number: 3:19-cv-00025-BRM-DEA
Filer: MICHAEL SCHULER
Document Number: 11

Docket Text:

BRIEF in Opposition filed by MICHAEL SCHULER re [10] First MOTION to Dismiss for failure to state a claim (Attachments: # (1) Certification, # (2) Text of Proposed Order) (MONTGOMERY, JOSEPH)

3:19-cv-00025-BRM-DEA Notice has been electronically mailed to:

JOSEPH W. MONTGOMERY joe@ed-law.com, aps@ed-law.com, bradley@ed-law.com,
joe@philalaw.org, zach@ed-law.com

PATRICK F. CARRIGG pcarrigg@lenoxlaw.com

3:19-cv-00025-BRM-DEA Notice has been sent by regular U.S. Mail:

The following document(s) are associated with this transaction:

Document description: Main Document

Original filename: n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1046708974 [Date=6/3/2019] [FileNumber=12624830-0]